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Attorneys for Defendant/Counter-Claimant

Swisstrax Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SNAP LOCK INDUSTRIES, INC.,

a Utah corporation,

Plaintiff,

vs.

SWISSTRAX CORPORATION,

a California corporation,

Defendant,

SWISSTRAX CORPORATION,

a California corporation,

Counter Claimant,

vs.

SNAP LOCK INDUSTRIES, INC.,

a Utah corporation,

Counter Defendant.

Case No: 2:17-cv-02742-RFB-BNW

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
RESPONSE & REPLY DEADLINES TO
PARTIES' MOTIONS**

(FIRST REQUEST)

1 Defendant/Counter-Claimant Swisstrax Corporation (“Swisstrax”) and Plaintiff /Counter-
2 Defendant Snap Lock Industries, Inc. (“Snap Lock”) (collectively, “Parties”), through their
3 undersigned counsel, hereby jointly submit this Stipulation addressing a briefing schedule for
4 recently filed motions.

5 Currently pending before this Court are the following motions:

- 6 1. Swisstrax’s Motion to Exclude the Reports and Testimony of Fred P. Smith (ECF
7 No. 164);
- 8 2. Snap Lock’s Motion for Summary by Judgment (ECF No. 166);
- 9 3. Swisstrax’s Motion to Exclude the Testimony and Reports of Scott Cragun (ECF
10 No. 170);
- 11 4. Swisstrax’s Motion for Partial Summary Judgment re Contract Vagueness (ECF
12 No. 174);
- 13 5. Swisstrax’s Motion for Summary Judgment on Snap Lock’s False Advertising
14 Claim (ECF No. 177);
- 15 6. Swisstrax’s Motion for Partial Summary Judgment on Snap Lock’s Breach of
16 Contract Claim, Namely Marketing Not Covered by the 2008 Settlement (ECF No.
17 178); and
- 18 7. Swisstrax’s Motion for Partial Summary Judgment *re Damages* (ECF No. 182).

19 All of these motions were filed on Monday, July 27, 2020. Swisstrax also filed its Motion for
20 Sanctions for Spoliation of Evidence on July 30, 2020 (ECF No. 188).

21 Given the number of pending motions, the Parties recognize that they need additional time
22 for briefing beyond that set out in the Local Rules so as to have an adequate opportunity to
23 thoroughly respond to each.

24 IT IS STIPULATED that the oppositions to ECF Nos. 164, 166, 170, 174, 177, 178, and
25 182 will be due on or before **August 31, 2020**;

26 IT IS FURTHER STIPULATED that the replies in support of Nos. 164, 166, 170, 174,
27 177, 178, and 182 will be due on or before **September 30, 2020**;

1 IT IS FURTHER STIPULATED that Snap Lock will have until **September 30, 2020**, to
2 respond to ECF No. 188. Swisstrax will have until **October 12, 2020**, to file its reply.

3 This is the first request to extend these deadlines and is not brought for purposes of undue
4 delay.

5 IT IS SO STIPULATED.

6 Dated this 31st day of July, 2020.

7
8 DICKINSON WRIGHT PLLC

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21 **IT IS SO ORDERED:**

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24 The Honorable Richard F. Boulware
United States District Judge

25 DATED: August 4, 2020.
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